BELLSOUTH REPLY COMMENTS

CC Docket No. 01-338

July 17, 2002

ATTACHMENT 6

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
	)	

AFFIDAVIT OF KENNETH L. AINSWORTH AND W. KEITH MILNER
ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS INC. ("BELLSOUTH")

The undersigned, each being of lawful age and duly sworn, do hereby state as follows:

QUALIFICATIONS

1. My name is Kenneth L. Ainsworth. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations for BellSouth. I have over thirty-six years experience in the telecommunications industry. My experience covers a wide range of network centers as well as outside plant construction. Specifically, I have managed and/or supported the following network centers: Switching Control Center, Special Service Center, Central Office Operations, Access Customer Advocate Center, Facility Management Administrative Center, Circuit Order Control Center, Network Operations Center, Major Account Center, 911 Center, Local Carrier Service Center, and the Customer Wholesale Interconnection Network Services Center. In addition, I deployed the Work Force Administration ("WFA") system, which is used by these centers to track the status of special service work. I am currently a staff Director directly supporting maintenance and provisioning, indirectly supporting pre-ordering, and ordering for the wholesale market. I have participated in and provided technical assistance for numerous Competitive Local Exchange Carrier ("CLEC") workshops in Florida, Georgia, and

Louisiana on issues dealing with pre-ordering, ordering, provisioning and maintenance of resold services and network elements.

2. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Assistant Vice President - Interconnection Operations for BellSouth. I have served in my present role since February 1996. My business career spans over 32 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas. I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina in 1970, with an Associate of Applied Science in Business Administration degree. I obtained a Master of Business Administration degree from Georgia State University in 1992.

PURPOSE OF AFFIDAVIT

3. This affidavit responds to claims by AT&T and various other commenters that incumbent local exchange carriers ("ILECs") should be required to continue to offer local switching on an unbundled basis because ILECs allegedly cannot provision unbundled local loops quickly enough or with sufficient service quality to allow CLECs to compete effectively through self-provided switching. AT&T in particular contends that (1) the coordinated hot cut process is unworkable because it "causes severe provisioning delays and prolonged service outages which are unacceptable to business customers" (Brenner Declaration, ¶ 57); and (2) hot cuts "could never be performed in the quantities that would be required to sustain a truly competitive local market." (Brenner Declaration ¶ 70). This affidavit also sets out CLECs' responsibilities in ensuring timely, reliable loop cutovers. Finally, this affidavit responds to the assertions that the existing loop cutover process might be circumvented though the use of so-called "electronic loop provisioning." (See generally Gerzberg Declaration).

4. These claims are unfounded, as are the similar claims of other commenters for at least four reasons. First, BellSouth has well-established, well-documented, and well-tested processes in place that allow it to efficiently, reliably, and timely provision unbundled hot cut loops. Second, BellSouth repeatedly has demonstrated that it provisions CLEC hot cut orders on a timely basis, with minimal disruption to end users. Third, BellSouth has the capacity to meet any reasonably foreseeable increase in demand for stand alone unbundled loops (*i.e.,* loops that are not ordered as a component of UNE-P) that might result from increased usage of competitive switching resulting from the elimination of BellSouth's obligation to provide unbundled switching. BellSouth's systems and processes are scalable and the capacity of those systems and processes may be readily increased as demand warrants. Fourth, BellSouth has for years accomplished loop cutovers affecting thousands of customers' service and has done

so with minimal service disruption or impairment. BellSouth can easily adapt its time tested central office conversion processes to accommodate mass cutovers of loops served by the so-called Unbundled Network Element Platform ("UNE-P") into stand-alone loops served by the CLEC's switch (rather than BellSouth's switch) upon CLEC request. The following paragraphs of this affidavit discuss each of those areas.

BELLSOUTH HAS WELL-ESTABLISHED, WELL-DOCUMENTED, AND WELL-TESTED PROCESSES IN PLACE THAT ALLOW IT TO EFFICIENTLY, RELIABLY, AND TIMELY PROVISION UNBUNDLED HOT CUT LOOPS.

5. Based on the evidence in the record, the FCC concluded, as did the Georgia and Louisiana Commissions, that BellSouth demonstrates that it provides unbundled local loops in accordance with the requirements of Section 271 and the FCC's rules. *In the Matter of Joint Application by Bellsouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana,* CC Docket No. 02-35 *Memorandum Opinion and Order,* FCC 02-147, ¶ 218 (rel. May 15, 2002) ("*Georgia/Louisiana Order*"). BellSouth offers unbundled local loops in all of the states in its region in the same manner as in Georgia and Louisiana.

6. Hot cuts effectuate the conversion of an existing BellSouth customer to a CLEC's network by transferring the customer's in-service loop over to the CLEC's network. BellSouth has established hot cut procedures that ensure accurate, reliable, and timely cutovers.

7. BellSouth has implemented three (3) hot cut processes; two (2) involving coordination at the time of the hot cut between BellSouth and the requesting CLEC, and one (1) process that does not involve such coordination. If unforeseen circumstances occur during the provisioning process that may cause the date or time of the conversion to be in jeopardy, BellSouth notifies the CLEC as soon as the jeopardy is identified to allow the CLEC to inform its customer as appropriate.

8. Coordinated loop cutovers involve a number of steps. Exhibit WKM-1 shows, pictorially and with a brief narrative, the various work steps involved in a typical coordinated loop cutover. These photographs were taken in BellSouth's Norcross, Georgia central office; however, the work steps BellSouth uses for hot cuts are identical in all nine states in BellSouth's region. To the extent that it is possible to perform work steps before the cutover (such as running in the new jumper on the Main Distributing Frame), BellSouth does so. The pictorials and narratives referenced below are meant to describe the process generally. Briefly, the work steps involved are as follows:

    - The BellSouth central office technician receives a call from the Customer Wholesale Interconnection Network Services ("CWINS") Center to begin cutover and the technician asks for the cable pair

identification of the loop to be cutover. This is shown on page 1 of Exhibit WKM-1.

- The technician types the cable pair identification into a database to find the loop cutover work order number. This is shown on page 2 of Exhibit WKM-1.

- The technician retrieves a copy of the work order for the unbundled loop. This is shown on page 3 of Exhibit WKM-1.

- The technician in the BellSouth central office responds to the BellSouth CWINS Center's request to initiate coordination of the overall cutover of service from BellSouth to the CLEC. This is shown on page 4 of Exhibit WKM-1.

- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician plugs a test set onto the loop and dials a special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-1.

- Next, the technician locates the existing jumper on the BellSouth Main Distributing Frame ("MDF") running between the loop and the BellSouth switch port. This is shown on pages 6-7 of Exhibit WKM-1.

- The technician locates and removes the end of the jumper connected to the BellSouth cable pair. This is shown on page 8 of Exhibit WKM-1.

- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-1.

- The technician then connects the one end of a new jumper between the loop and a connector block on a cable rack with tie cables to the CLEC's collocation arrangement. This is shown on page 10 of Exhibit WKM-1.

- The technician then weaves the new jumper wire through the cable rack to reach the tie cables to the CLEC's collocation arrangement. This is shown on page 11 of Exhibit WKM-1.

- The technician connects the second end of the new jumper to the connector block and thus to the tie cable to the CLEC's collocation

equipment. This is shown on page 12 of Exhibit WKM-1.

- The technician next verifies that the loop is connected to the expected switch port and telephone number in the CLEC's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-1.

- Upon successful completion of the loop cutover, the technician verifies with the CLEC that the order was correctly worked, closes the work order, and notifies the CWINS Center. This is shown on page 14 of Exhibit WKM-1.

9. Once the cutover is complete, the CLEC sends appropriate messages to effectuate number porting.

10. BellSouth has developed a detailed flow chart depicting the entire hot cut process. This process flow is attached to this Affidavit as Exhibit WKM-2.

11. BellSouth does testing in advance of the hot cut for all designed loops that come with test points. For such circuits, BellSouth will check the circuit 24 to 48 hours prior to the due date. For non-designed loops, BellSouth performs continuity tests within the BellSouth central office between the CLEC's collocation arrangement and BellSouth's network. For both designed and non-designed circuits, BellSouth tests on the cutover due date for dialtone from the CLEC's switch.

12. On the due date, BellSouth tests for dialtone from the CLEC's switch for all loops, whether designed or non-designed. BellSouth also monitors the line for customer use. If during the test, BellSouth does not receive dialtone from the CLEC's switch, the cutover will not take place unless the CLEC corrects the problem within fifteen (15) minutes or pays for standby time. Otherwise, the CLEC must reschedule the conversion.

13. BellSouth does not perform loop cutovers simultaneously with number porting for the very important reason that to do so leaves the end user customer at risk of the number porting being completed early and calls bound for the end user customer being misdirected to the CLEC's switch. The loop cutover is much more complicated in terms of the work steps involved (for both BellSouth and the CLEC) than the number porting. BellSouth performs all "up front" work in anticipation of the loop cutover being successfully completed.

14. The cutover process can be even more unobtrusive to the end user customer if one of several processes is followed. The CLEC might, for example, schedule the cutover late at night, on a weekend, or any other time when the end user customer will not be using the service. Other procedures such as pre-wiring cross connections or jumpers in anticipation of BellSouth's providing the unbundled network elements likewise minimize or eliminate any inconvenience to the end user customer.

15. BellSouth has procedures in place to prevent premature disconnects from occurring during the number porting process. In BellSouth's Local Carrier Service Center ("LCSC"), if an order is supplemented to change the due date, the process requires all associated orders to be updated with the new due date. This includes the loop portion of the order and the disconnect portion. In addition to this step, BellSouth has developed a mechanized program that automatically places a disconnect order in "delay" status in BellSouth's MARCH system. MARCH is a system that facilitates administering what are referred to as "recent changes" messages and handles computer memory administration functions in BellSouth's switches. Once the CLEC's order is in delay status, it requires manual intervention to release the disconnect order to the BellSouth switch. The CWINS Center process requires the CWINS Center Technician to verify that the order is "delayed" in MARCH before the due date. If a CLEC supplements an order very late in the process to change the due date, the chance of a premature disconnect occurring is increased. BellSouth has asked CLECs to call the CWINS Center if the CLEC is supplementing an order to change the due date less than 24 hours before the original due date to reduce the chance of a premature disconnect happening.

16. BellSouth makes available its Connecting Facility Assignment ("CFA") database to CLECs via the Internet. BellSouth provides CLECs with the CFAs (that is, cable and pair assignments for the cable between the CLEC's collocation arrangement and BellSouth's equipment, such as distributing frames or cross-connect bays) assigned to the CLEC at the time the CLEC's collocation arrangement is made available. Each CLEC is required to maintain its own connecting facility assignment records and assign each pair that the CLEC wants BellSouth to use in order to connect BellSouth's facilities to the CLEC's facilities. CLECs may use the information on BellSouth's Internet website to verify (before submitting Local Service Requests ("LSRs") to BellSouth) the CLEC-provided CFA information and thus minimize or eliminate problems or delays.

17. When a CLEC submits its LSR for an unbundled loop, it must provide the CFA to which it wants the loop connected and thus delivered to the CLEC's collocation arrangement. Connecting facilities are typically those cables connecting a CLEC's collocation arrangement with BellSouth's distributing frame. Most likely as the result of their poor record keeping, some CLECs have submitted LSRs containing CFAs that are already being used for other loops. BellSouth is providing CLECs access to Loop Facility Assignment Control System ("LFACS") via Telecommunications Access Gateway ("TAG") to verify CFA assignments per release version 10.5 as of June 1, 2002. In the meantime, BellSouth has provided another tool that CLECs can use to verify its CFAs and meets BellSouth's obligations under the Act. BellSouth posts a report to its interconnection website, accessible by CLECs, that contains CLEC-specific CFA assignments. This report is updated daily. This report shows the status of each CFA between the CLEC's collocation arrangements and BellSouth's network. CLECs have the opportunity to check the status of its CFA before

submitting its LSR to the Local Carrier Service Center ("LCSC"). In the alternative, CLECs can use the web-based report to keep their own databases accurate and to query their own databases prior to submitting an LSR to BellSouth. If CLECs were to use this tool, I believe that CFA problems would be greatly reduced, if not eliminated altogether.

18. In the *Georgia/Louisiana Order,* ¶ 220, regarding hot cuts, the FCC concluded:

> Like the Georgia and Louisiana Commissions, we find that BellSouth is providing voice grade loops through hot cuts in Georgia and Louisiana in accordance with the requirements of checklist item 4. BellSouth provides hot cuts in Georgia and Louisiana within a reasonable time interval, at an acceptable level of quality, with minimal service disruption, and with a minimum number of troubles following installation.

BELLSOUTH REPEATEDLY HAS DEMONSTRATED THAT IT PROVISIONS CLEC HOT CUT ORDERS ON A TIMELY BASIS, WITH MINIMAL DISRUPTION TO END USERS.

19. AT&T asserts that BellSouth's hot cut process is inherently unreliable due to its manual nature and results in provisioning delays, service outages, and other service problems. AT&T's point might be taken more seriously if it were not the case that AT&T participated with BellSouth in developing and refining the very hot cut process that AT&T now criticizes. Months of cooperation and work resulted in a hot cut process that ensures timely, disruption-free cutovers. Based on its flawed premise that the hot cut process that BellSouth and AT&T developed is inherently unreliable, AT&T argues that UNE-P should remain available until the manual hot cut process is replaced with the "Electronic Loop Provisioning" scheme proposed by AT&T. The facts demonstrate, however, that BellSouth's hot cut process is reliable, and, in fact, allows CLECs a meaningful opportunity to compete.

20. Across its nine-state region, BellSouth estimates that it has used the hot cut procedures outlined above to provision 131,494 loops in the twelve month period beginning April 1, 2001, and ending March 31, 2002, of which 99.6% were provisioned within the 15-minute benchmark. In nine states, as measured by performance measurements approved by the respective state commissions, BellSouth provisions hot cut loops on time, with a minimum of disruption to the end-user, and few installation troubles. Further, in its Order granting BellSouth in-region interLATA long distance authority in Georgia and Louisiana, the FCC has specifically found that BellSouth satisfies the requirements of the Act by providing voice grade unbundled loops through hot cut conversions "within a reasonable time interval, at an acceptable level of quality, with minimal service disruption, and with a minimum number of troubles following installation." *Georgia/Louisiana Order*, ¶ 223. (footnotes omitted).

21. BellSouth's on time and outage performance for hot cuts is measured by Performance Measures P-7 & P-7A, Coordinated Customer Conversions and Hot Cut Timeliness - % Within Interval and P7C, Hot Cut Conversions - % Provisioning Troubles Received Within 7 Days of a completed Service Order. During the months of January through April 2002, BellSouth completed 9,655 of the 9,693 Coordinated Customer Conversions (99.61%) throughout the BellSouth region within the 15-minute benchmark. There were only 5 premature disconnects during the 4 month period for the entire nine state region. These coordinated conversions included over 35,000 lines that averaged 2:42 minutes (minutes: seconds) per line. The % Provisioning Troubles Received Within 7 Days of a completed Service Order measurement includes all lines, coordinated or not. There were a total of 39,156 lines put into service on a hot cut basis during January through April 2002, with less than 1% receiving a trouble report during the first seven (7) days after completion.

BELLSOUTH HAS THE CAPACITY TO MEET ANY REASONABLY FORESEEABLE INCREASE IN DEMAND FOR STAND ALONE UNBUNDLED LOOPS (*I.E.*, LOOPS THAT ARE NOT ORDERED AS A COMPONENT OF UNE-P) THAT MIGHT RESULT FROM INCREASED USAGE OF COMPETITIVE SWITCHING RESULTING FROM THE ELIMINATION OF BELLSOUTH'S OBLIGATION TO PROVIDE UNBUNDLED SWITCHING. BELLSOUTH'S SYSTEMS AND PROCESSES ARE SCALABLE AND THE CAPACITY OF THOSE SYSTEMS AND PROCESSES MAY BE READILY INCREASED AS DEMAND WARRANTS.

22. AT&T also argues that hot cuts cannot be provisioned in sufficient volumes to allow facilities-based CLECs to serve the mass market. AT&T's argument is based on conjecture. The facts demonstrate otherwise. BellSouth can, in fact, scale its operations to accommodate any reasonably foreseeable increase in hot cut demand that might result from the elimination of unbundled switching and UNE-P.

Local Carrier Service Center ("LCSC") and Customer Wholesale Interconnection Services ("CWINS") Scalability

23. BellSouth's LCSC, CWINS and the appropriate network operations groups, are fully equipped and capable of meeting any reasonable increase in load volumes associated with UNE loop conversions. Staffing of these operational groups was predicated on expectations of higher UNE loop conversion volumes than currently exist. There are three dedicated UNE LCSCs serving the CLEC community for preordering and ordering. Further, there are three dedicated CWINS operational centers to perform hot cut coordination, when required. These operational groups have currently redirected resources due to lower than expected UNE conversion volumes. That means these operational groups have the available capacity to reallocate these personnel at such time that the UNE conversion volumes increase.

24. The extent to which an increase in hot cut volumes would increase the workload of the LCSC and the CWINS is not entirely clear. LCSC and CWINS personnel provide support for CLECs across the entire range of wholesale products and services BellSouth makes available under the 1996 Act. Any increase in hot cut volumes resulting from the absence of UNE switching is likely to be accompanied by a decrease in other order types (say, UNE-P), such that the resources currently dedicated to one could then be devoted to the other. Thus, in the absence of CLEC forecasts it is difficult to estimate the net impact of such volumes on the LCSC and the CWINS. Nonetheless, BellSouth has proven its ability to size the workforce of the LCSC and CWINS to handle an increasing volume of work while maintaining a high level of quality as is shown in the BellSouth performance measures. Between January 2000 and April 2001, BellSouth increased the number of trained technicians and service representatives in the CWINS and LCSCs from about 938 to about 1860. BellSouth increased the workforce in these centers by 98.3% over this period while maintaining a high quality of service to the CLECs.

25. Initially, LCSC service representatives are hired and trained in a single product type, for example, residential resale or simple business resale or UNE-P. As service representatives become more proficient with their initial discipline, additional training to handle other types of order requests is provided. With this cross training, many LCSC service representatives are able to handle multiple types of service order requests thus enabling the LCSC organizations to move service representatives from one function to another, for example, from resale to UNE-P, or from UNE-P to UNE-Loop, as necessary to respond to variations in ordering volumes on particular product types. CWINS employees complete various levels of technical classroom training, in addition to receiving CWINS specific training on the CLEC products or functions they are assigned to support. CWINS employees therefore are capable of handling provisioning, maintenance, and repair functions for a variety of wholesale products with minimal additional on-the-job training. The CWINS reallocates its employees among products as necessary to handle shifts in demand.

26. It can be said with certainty that BellSouth has processes in place designed to ensure that any such increase can be absorbed without sacrificing the quality and reliability of the services performed by the LCSC and CWINS organizations. The LCSC and CWINS organizations use sophisticated force models to ensure that their operations are adequately staffed to meet anticipated CLEC demand. Indeed, the LCSC and CWINS force models have been reviewed and approved by the FCC in connection with BellSouth's Georgia and Louisiana 271 Applications. BellSouth, with the assistance of accurate CLEC forecasts, could provide even more certainty in assuring the force models projected accurate resources to support future CLEC volumes. Even so, the loop conversion results validate that the current force models have been successful in meeting CLEC service order demand with quality and reliability. Utilizing the force models, BellSouth has staffed the LCSC and CWINS organizations to accommodate the projected volumes of order activity for all product types, including UNE Loops. As stated above, the forecast for UNE loop conversions has been under run. However, BellSouth has the personnel in place to meet these projected volumes had they been met. Although BellSouth cannot predict actual future volumes should UNE-P and local switching be eliminated without accurate CLEC forecasts, BellSouth can ensure that BellSouth has the proven capability to staff its Centers to properly handle any volume of orders that is reasonably forecasted.

27. Some of the basic data used to develop these force models include:

- Historical trends
- Time and motion studies
- Number of business days per month
- Productive minutes per day per employee

- Average handle time per item
- Average items handled per day per employee
- Internal forecasts of CLEC ordering volumes for particular product types
- Projected CLEC trouble reports
- Percentage of orders/reports received electronically
- Percentage of orders/reports received manually.

28. Using criteria such as these, the BellSouth LCSC and CWINS organizations are able to trend volumes over a forward-looking period (three (3) months, twelve (12) months, etc.) to determine if force additions should be accelerated to meet demand. The force models allow BellSouth to anticipate the need to hire, train, and/or reallocate LCSC and CWINS employees in advance of changes or trends in ordering activity and to thereby provide the required capacity in sufficient time to meet actual demand.

29. In addition to allowing the LCSC and CWINS to project long-term force requirements, the force models are also used on a regular basis to handle any unanticipated spikes in volume, and generally to make sure that all required work is handled in a timely and efficient manner. Spikes in activity are handled through a variety of means, including overtime work, temporary reallocation of work force within the centers to handle volumes, and load balancing between the different centers.

30. Accurate and timely CLEC forecasts help BellSouth plan for future hot cut volumes, but are not required for the operation of its force models. CLECs are requested to provide a forecasted number of unbundled loops a minimum of 30 days prior to submitting their first unbundled loop order. After CLECs order their first unbundled loop, BellSouth requests six-month interval forecasts by unbundled loop type and wire center. Accurate and timely forecast information is helpful in assisting BellSouth meet projected hot cut volumes; however, BellSouth force models are not dependant upon receipt of such forecasts. Rather, as noted above, the force models automatically factor demand projections based on historical trends into LCSC/CWINS staffing requirements. BellSouth makes adjustments, as necessary, to handle sudden increases in volume – and undertakes hiring initiatives as soon as it becomes apparent that additional resources will be necessary to handle anticipated future demand. Nonetheless, CLECs could help BellSouth anticipate and fulfill future staffing needs by providing timely and accurate forecasts, especially for substantial increases in volumes.

31. BellSouth's performance measurements referenced above plainly demonstrate that the LCSC and CWINS organizations are staffed sufficiently to handle more than the current volumes of unbundled loop orders. They also establish that BellSouth has scaled its resources as necessary to handle increases in volumes of such orders over the years. More fundamentally, the outstanding performance of the LCSC and CWINS in handling both steady growth and spikes in demand makes clear that BellSouth will continue to staff its LCSC and CWINS organizations sufficiently to handle any reasonably foreseeable demand for hot cut conversions.

32. Moreover, BellSouth has a strong incentive in place to ensure that the LCSC and CWINS are adequately staffed to meet foreseeable demand for all order types, including hot cut loops. As noted earlier, performance measurements apply to BellSouth's hot cut performance and BellSouth remains subject to penalties and voluntary payments should it fail to meet those measures.

33. Accordingly, it is clear that BellSouth has processes and procedures in place to ensure that the LCSC and CWINS can handle any reasonably foreseeable increase in demand for hot cut loops that would come with elimination of switching as a UNE, and that it has ample incentives to ensure that the LCSC and CWINS in fact do so.

Central Office Scalability

34. As described above, the central office work to provision a hot cut primarily involves the placement and removal of cross connects by central office technicians. Cross-connect placement is required for both retail and wholesale service; it is basic, fundamental work that is performed on a daily basis in central offices throughout BellSouth's region. BellSouth estimates that today, in its central offices, there are millions of operational cross connects every one of which was placed by central office technicians in the regular course of their job responsibilities.

35. Central office staffing requirements are determined based upon the number of "full time equivalent" ("FTE") employees required to perform the anticipated work tasks for that central office, including jumper placement, maintenance work, testing, etc. A central office with low workload may be staffed only with roving technicians who work at the office on an "as needed" basis. On the other hand, central offices with significant work activity require more technicians. Bellsouth maintains flexibility with regard to staffing, making adjustments and reallocations of work force among central offices as necessary to support changes and/or spikes in workload volumes and staffing requirements.

36. To estimate the impact of a potential increase in hot cut volumes stemming from the unavailability of UNE switching, BellSouth uses this same methodology to determine the number of FTE central office technicians that would be required if demand for hot cuts increased dramatically. Because it is BellSouth's position that CLECs are not

impaired without access to unbundled switching, BellSouth believes that removing switching from the UNE list would not diminish growth in CLEC volumes.

37. Even a dramatic increase in hot cut orders in any particular central office can be readily accommodated. Simply put, when compared to the vast amount of work handled by BellSouth's central office technicians, any reasonably foreseeable increase in hot cut demand that would result from the elimination of switching from the UNE list would be easily accommodated by BellSouth's central offices.

38. Moreover, even if it were the case that the increase in hot cut volumes that would result from removing switching from the UNE list fell disproportionately on one or a few central offices, BellSouth would still be able to accommodate that demand. BellSouth has abundant experience in handling spikes in demand at individual central offices, and is easily capable of accommodating those spikes, provided it receives adequate notice.

39. For example, BellSouth regularly experiences spikes in ordering activity at the start and end of the school year, as families and, more particularly, college students establish and disconnect telephone service as they move in and out of town. Because of the central office layout, each of these new lines required between one (1) and six (6) cross-connects to establish service. In the spring, a similar increase in workload volumes will be seen as the school year ends and service is disconnected (involving the removal of those same cross connects). BellSouth handles such increases in volumes by increasing overtime, and reallocating central office technicians from other central offices and work areas (such as maintenance and repair) that are not seeing similar work load increases.

40. The fact that BellSouth is aware that volumes will increase at the start and end of the school year assists it in ensuring it has adequate resources in place to accommodate the anticipated workload. As noted earlier, timely CLEC forecasts of anticipated increases in UNE-Loop volumes enhance BellSouth's ability to ensure it has adequate resources in place to meet that demand in a similar fashion.

41. As discussed earlier, loop conversion work is just part of the overall work done on a daily basis in any given central office. Depending on the work load and lay out of the central office, anywhere from 2 to 10 (or more) central office technicians may be at work simultaneously on the same MDF with no negative impact on productivity. Cable pairs are deployed on the MDF as cables are brought into the central office. When multiple loop conversions are scheduled in a single day for a single central office, the pre-wiring work may be done over several shifts in the days leading up to the due date. Because the access lines for these conversions are generally spread throughout the central office, the actual cutovers are then accomplished without technicians interfering in each other's workspace.

42. It is possible that hot cut conversions of end-users with large numbers of access lines at a single location (for example, the conversion of a business park or campus) could be located on a relatively narrow part of the MDF, limiting central office technician access. As noted earlier, hot cuts with large quantities of loops to be converted are to be worked as coordinated projects. This enables BellSouth to work with the CLEC to ensure that the requested conversions are provisioned in a time frame that accounts for any concentrations of access lines that could impact distributing frame access.

43. The performance measurement results discussed earlier demonstrate that BellSouth is committed to provisioning hot cuts for the CLECs in a manner that ensures that the stringent standards are met. As described in this affidavit, BellSouth's long-standing processes and procedures (many developed in cooperation with CLECs) for the scaling of its resources to handle both steadily increasing volumes, as well as unanticipated spikes in those volumes, are designed to ensure that those standards will continue to be met as levels of competition increases – even without the continued availability of unbundled switching.

BELLSOUTH CAN EASILY ADAPT ITS TIME TESTED CENTRAL OFFICE CONVERSION PROCESSES TO ACCOMMODATE MASS CUTOVERS OF LOOPS SERVED BY THE SO-CALLED UNBUNDLED NETWORK ELEMENT PLATFORM ("UNE-P") INTO STAND-ALONE LOOPS SERVED BY THE CLEC'S SWITCH (RATHER THAN BELLSOUTH'S SWITCH) UPON CLEC REQUEST.

44. AT&T also now claims that it should continue to be able to use UNE-P "as a transitional provisioning mechanism until those customers can be migrated to AT&T's own switches using a process that substantially reduces the persistent problems with line-by-line hot cuts." (Brenner Declaration, ¶ 44). That process, AT&T further argues, is nothing other than "bulk cutovers" performed on a "project managed basis." (Brenner Declaration, ¶ 45).

45. AT&T's arguments in this regard are both unfounded and misleading. Hot cuts done on a "project managed basis" are simply conversions with large numbers of loops. The same basic provisioning processes (as described in this affidavit) are used for both individual hot cuts and projects. Contrary to the statements made by AT&T (Brenner Declaration, ¶ 46), BellSouth's technicians are dedicated to an individual hot cut, just as they are for project conversions. Communication between companies exists on an individual hot cut, just as it does on a project-managed cut – meaning that any problems that may arise can be resolved at the time of the cut rather than later. In all states in BellSouth's region, BellSouth will negotiate hot cuts outside of regular business hours at the request of the CLEC – just like project managed hot cuts. BellSouth's hot cut performance, as measured by approved performance measures, demonstrates that CLECs simply are not suffering the "persistent problems with line-by-line hot cuts" claimed by AT&T.

46. More importantly, however, BellSouth has for years accommodated cutovers of thousands of individual loops from one switch to another with minimal customer interruption or service impairment. BellSouth has replaced hundreds of switches with newer switches and has developed detailed methods and procedures to ensure error free conversions. Indeed, BellSouth's central office cutover process has been perfected to the extent that conversions have been accomplished with an ensuing trouble report rate of only about one tenth of one percent. The following paragraphs generally describe the processes BellSouth uses to ensure mass cutovers of loops from one switch to another.

47. BellSouth's process to provide timely and efficient central office cutovers including error free cutovers of loops from one switch to another is well documented and is closely coordinated from the time a decision is made to replace a switch until post conversion activities are complete. Once the decision has been made to replace a switch and a scheduled cut date is confirmed, the next step is to establish a local conversion committee. Individual circumstances for each switch replacement will dictate the extent of involvement of each represented work group. It is the responsibility of the Central Office Switch Replacement ("COSR") Interdepartmental Coordination Committee to jointly plan and implement the central office switch replacement. It is the responsibility of every department and work group to participate and cooperate in this process to ensure that the task is accomplished in the most efficient and economical manner with the least effect to BellSouth's customers. This process includes, but is not limited to, the following:

- Preparing and maintaining the detailed work schedule used to accomplish the switch replacement.
- Determining the number of special services and message trunks involved.
- Determining special service and message trunk critical dates that will be required.
- Determining the need for any subcommittees.
- Securing vendor translations due dates.
- Determine if any work functions will be contracted out to vendors.
- Ensuring that all pre and post billing preparation and verifications are carried out.
- Producing and distributing minutes of the implementation meetings.

48. The local COSR committee will develop a Master Work Schedule to accomplish the switch replacement. The Master Work Schedule outlines work items, responsible departments, work groups, and the start and complete dates for completing each

activity. Because each conversion is different, the individual circumstances must dictate the activities and time intervals necessary for a successful conversion. All work groups participate in the development of the Master Work Schedule.

49. The sub-committees that would normally develop detailed work schedules for the Master Work Schedule are as follows:

- Planning Committee
- Interdepartmental Coordination Committee
- Outside Plant Provisioning Sub-Committee
- Job Contact Sub-Committee
- Trunk Assignment/Design Special Services Sub-Committee
- Line Assignment Sub-Committee
- Detailed Cutover Procedure Sub-Committee

50. BellSouth requires written concurrence in the Master Work Schedule by all work groups. Written concurrence by the COSR committee members prevent the possibility of important work items being omitted from the Master Work Schedule or being scheduled improperly. As discussed previously, through the use of this process, BellSouth has for years accommodated cutovers of switches and thousands of individual loops from one switch to another with minimal customer interruption or service impairment.

51. Many of the steps in BellSouth's central office conversion process are applicable to the process of converting mass quantities of loops as part of UNE-P arrangements served by BellSouth's switch to stand-alone unbundled loops served by the CLEC's switch. The following paragraph describes a process for converting a large quantity of UNE-P arrangements to stand-alone unbundled loops during a single conversion.

52. A mass UNE-P to unbundled loop transition would be delivered in a planned and coordinated manner very similar to BellSouth's standard conversion of residential or business customers from one switch to another during a switch replacement. The main difference is that the loops that are currently part of the UNE-P will now be cutover to a CLEC's switch instead of to a new BellSouth switch and there will be changes in the billing. The unbundled loop will be delivered to the CLEC at its collocation arrangement via a cross connect. In today's environment, prior to the cutover, jumpers will be run from the collocation point of interconnection to the MDF and the loop is temporarily tied to the frame until the time for the cutover to take place. Another alternative BellSouth is willing to investigate with CLECs is the "half

tapping" of loops such that a given unbundled loop is simultaneously connected both to BellSouth's switch and to the CLEC's switch (though only one of the two switches is actively handling switching for the end user.) This half tapping might be accomplished at an Intermediate Distributing Frame, ("IDF") for example, such that the connections to BellSouth's switch are removed in mass at the time of the conversion. This is similar to the process for central office conversions involving the moving of thousands of loops from one switch to another in a very short period of time.

53. As an alternative, BellSouth has successfully evaluated the use of electronic cross connection equipment in its Roswell, Georgia location for making large scale transfers of unbundled loops from BellSouth's switch to a CLEC's switch. Use of this equipment would enable the actual cutover process to be done in an electronic manner rather than via manual cross connections at the time of the cutover. The device BellSouth evaluated for this purpose is manufactured by Turnstone Systems, Inc. and allows all of the cross connection work to be done in advance. The cutover may be executed in a single conversion electronically at the discretion of the CLEC. Before such a product is approved for general use within BellSouth's network, however, BellSouth needs a commitment from CLECs as to the quantity of very large scale loop cutovers to be performed and BellSouth wants the CLECs to have input into the decision process as to which party would control which work function executed during the electronic conversion. Further, because BellSouth believes that the use of this device is economically viable (that is, the use of the electronic device is justified rather than the use of manual loop cutover processes) only in instances where very large transfers of unbundled loops or large UNE loop volume increases are forecast, input from interested CLECs would allow BellSouth to conduct a comprehensive business case to consider the device further. Nonetheless, BellSouth is pleased with the operation of this device and BellSouth is willing to work with CLECs to further test the use of this mass loop cutover device.

CLEC RESPONSIBILITIES

54. Even with the use of any of the processes described earlier for converting a large quantity of UNE-P arrangements to stand-alone unbundled loops, BellSouth and the CLEC both have significant responsibilities that must be performed correctly and timely in order to ensure an error free conversion. The following paragraphs describe the CLEC's responsibilities in this regard.

55. The CLEC must obtain collocation space through BellSouth's Collocation offerings, which are detailed in the BellSouth Collocation Handbook. This Handbook is available through the BellSouth Interconnection web site for CLECs.

56. Enhanced Extended Loops ("EELs") are combinations of BellSouth's UNE Transport with or without Multiplexing functionality and BellSouth's Local Loop UNE. This offering is intended to provide connectivity from an end user's location through that

end user's Serving Wire Center and then connected to the CLEC's collocated Serving Wire Center. The circuit must be connected to the CLEC's switch for the purpose of provisioning telephone exchange service to the CLEC's end-user customers.

57. CFAs are required to be provided by the CLECs at the collocation area in quantities that would handle the number of unbundled loops that are being transitioned.

58. Coincident with the cutover of the UNE-Ps to unbundled loops, the CLEC must have its switch ready to provide the same grade of service and features as is being provided by BellSouth.

59. The CLEC would be requested to attend one or more meetings of the Interdepartmental Coordination Committee to make sure their pre-conversion efforts became a part of the Master Work Schedule. During the Coordinated Hot Cut Process, the CLEC must be available and perform its assigned functions as described in Exhibit WKM-2.

60. It is the responsibility of the CLEC to appropriately interface with the Number Portability Administration Center in order to port calls to the end-users existing telephone number from the BellSouth switch to the CLEC switch.

AT&T'S ELECTRONIC LOOP PROVISIONING ("ELP") PROPOSAL IS VERY COSTLY, AND CANNOT BE ECONOMICALLY JUSTIFIED

61. AT&T proposes a scheme they entitle Electronic Loop Provisioning ("ELP") in the Declaration of Irwin Gerzberg on behalf of AT&T Corporation. In this scheme, AT&T proposes a large-scale expansion of Asynchronous Transfer Mode ("ATM") technology. Data traffic carried over DSL systems is often 'packetized' into ATM cells today. While the bulk of ADSL systems probably employ ATM, there is nothing to mandate its use. In fact, some pre-standard ADSL implementations employed Ethernet-like framing rather than ATM. The AT&T paper simply ignores those DSL technologies that do not employ ATM. Similarly, it overlooks those DSL technologies that do not co-exist with a voice line on the same cable pair, e.g., SDSL, SHDSL. Finally, it fails to take into account those data transport technologies that do not employ DSL technology at all, e.g., DDS. The AT&T proposal would extend this concept by 'packetizing' voice traffic via what AT&T terms "true" Next Generation Digital Loop Carrier (tNGDLC) systems employing ATM connections between the Remote Terminal and the Central Office. The definition of a "true" NGDLC system is conveniently provided by AT&T itself, in Clause 22 of Mr. Gerzberg's Declaration. This definition discounts the vast majority of extant NGDLC systems as not being "true" NGDLC systems, as most existing systems do not contain a voice cell processor, i.e., they do not transport the voice traffic via ATM. At the central office, the ATM cells would be switched. The cells associated with voice traffic would be routed to voiceband switching systems equipped with ATM gateways, while the cells associated with data traffic would be switched to data networks. AT&T maintains

that such a scheme would enable the rapid transfer of end-users from one carrier to another, via a software command, in lieu of the hot-cut process used today. A pair of wires, i.e., a 'jumper', is used today to complete a circuit, from the point at which a loop is terminated on the MDF, to the point on that frame at which a central office line circuit is terminated. In the existing 'hot-cut' process, this jumper is removed, and another is placed, involving the same loop, but a line circuit from a different central office switch (that is, the CLEC's switch).

62. The operational benefits of such a scheme are indeed, at first glance, attractive. The costs required to implement this proposal, however, are very large and cannot begin to be offset by eliminating the cost of the hot cuts. Furthermore, adopting the scheme would require industry-wide acceptance of one DSL technology. Such acceptance will not be obtained without lengthy regulatory proceedings. Finally, this scheme would stifle innovation in the loop plant.

ELP IS VERY COSTLY, AND CANNOT BE ECONOMICALLY JUSTIFIED

63. Interestingly, the AT&T proposal does not include any estimates of its cost. AT&T only characterizes the cost as incremental when it states, "the ELP architecture entails incremental investment to modernize the loop plant, it leverages existing investments already made by incumbent LEC's."[1] This statement understates the cost, and overstates the investment that can be leveraged. The investment needed to implement the proposal would be huge, and the proposal could make use of practically no existing investment.

64. First, the proposal would "upgrade" all Digital Loop Carrier ("DLC") systems to tNGLDC.[2] BellSouth believes that a wholesale conversion to tNGLDC would require replacement of all of its existing DLC systems. A small percentage of BellSouth's DLC investment could be classified as NGLDC, although these systems don't meet AT&T's definition of tNGDLC because BellSouth has elected not to deploy DLC systems that transport voice via ATM.[3] BellSouth's experience with in-plant upgrades of working DLC systems suggests that even those existing NGLDC systems would need to be replaced. From the point of view of existing DLC systems, there is no investment to leverage.

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[1] See Clause 19 of Herzberg Declaration.

[2] See Clause 22 of Herzberg Declaration.

[3] Instead, BellSouth transports the voice traffic over Time-Division Multiplexed (TDM) facilities, and the data over ATM facilities. In Clause 24 of its proposal, AT&T suggests that this is an "inefficient and costly design," but that assessment does not accurately reflect the costs of converting existing switches and Operational Support Systems to accommodate ATM.

65. To quote from AT&T's proposal, "Where the customer loops terminate at the ILEC central office, then the tNGDLC functionality will be deployed in the central office."[4] It should be made clear here that the "functionality" that AT&T is discussing is that of a Remote Terminal ("RT"), i.e., analog to digital (and vice-versa) conversion of the voice, conversion to ATM (according to AT&T's definition of tNGDLC), multiplexing, etc. This is entirely new investment, which also simultaneously strands the existing investment in central office analog line interfaces. There is no existing investment to leverage.

66. To continue with AT&T's proposal, the ATM traffic from of these new tNGDLC systems would connect to an ATM module in the central office.[5] Again, there needs to be clarity with respect to the terminology used to ensure that the required functionality is not inappropriately minimized. At issue is the use of ATM switching. Using AT&T's words, this device is needed to "sort out the commingled traffic carried by the feeder facility and deliver it to the customer's chosen carrier, whether an ILEC or a competitor...."[6] Such sorting out is accommodated in an ATM switch by reading the address of an ATM cell and routing that cell to an interface associated with a carrier that employs that address.

67. While BellSouth does have some ATM switches deployed to support some of its data service offerings, BellSouth does not have an ATM switch in every central office. Furthermore, it is doubtful that, in those central offices where ATM switches are deployed, the existing switch can be scaled to the size required to accommodate all traffic in that central office. There is little or no existing investment that can leveraged here.

68. Finally, AT&T would have BellSouth (and apparently all Local Exchange Carriers including CLECs) equip all of the existing voice switches with Voice over ATM (VoATM) gateways.[7] These gateways are needed because these switches do not employ ATM. A gateway is needed to convert from ATM to the Time Division Multiplexing ("TDM") format used when interfacing to the switch. Again, this is a new investment. There is no existing investment to leverage.

69. In evaluating the economics of the AT&T proposal, one need not develop costs for the ATM switches or the VoATM gateways. The costs of the DLC systems alone are sufficient to judge the economics of this proposal as unworkable.

70. While the AT&T proposal is silent regarding the percentage of lines that should be converted, the benefits AT&T cites require that an end-user be converted to the new

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4 See Clause 22 of the Herzberg Declaration.

5 See Clause 25 of the Herzberg Declaration.

6 See Clause 26 of the Herzberg Declaration

7 See Clause 30 of the Herzberg Declaration.

network architecture, *before* the 'software command' would be issued to transfer them from one carrier to another. It is impossible to forecast, of course, which end-users are candidates for such transfers and which are not. In order to accrue the benefits espoused by AT&T, then, the entire population of lines must be converted. BellSouth estimates that the cost of these new DLC systems, to both replace the existing DLC systems and replace the existing central office line interfaces, would be approximately $200 per line. Extrapolating this over BellSouth's base of about 25 million lines yields an initial cost of roughly 5 billion dollars.

71. While this cost does not include the cost of the ATM switches, ATM gateways, or the associated Operations Support Systems ("OSS"), it proves the point. One cannot begin to justify this cost by simply eliminating some ten thousand or so hot cuts per month, with any reasonable cost per cutover. For purposes of illustration, scale both costs by ten thousand. How much would one hot cut per month have to cost, in order to justify an initial expenditure of some $500,000 (5 billion divided by ten thousand) that promises to eliminate that cost? The cost of the cutover would have to be on the order of ten thousand dollars or so, depending on the required payback period that one assumes. No matter what assumptions are used, it is unreasonable to suggest that a hot cut is anywhere near this expensive.

ADOPTING ELP WOULD REQUIRE INDUSTRY-WIDE ACCEPTANCE OF ONE DSL TECHNOLOGY

72. Today, both the incumbent and competitive carriers employ their own Digital Subscriber Line Access Multiplexers ("DSLAMs") or equivalent functionality. These products contain the network-end DSL transceivers that are necessary to transmit and receive data to and from the end-user's DSL modem. There is an industry standard for ADSL, which would suggest that there is a good chance that any customer-end ADSL modem could interoperate with any network-end ADSL transceiver.[8]

73. ADSL, though, is not the only DSL technology in the marketplace. There are a number of other DSL technologies, both standard and proprietary. In addition to standardized ADSL (which apparently is the only DSL arrangement considered in the AT&T proposal), even other proprietary DSL technologies operate on the same line as voice, as does ADSL. Two examples of such proprietary products are the Nortel 1-Meg modem and the Paradyne MVL. Whatever DSL products are deployed, whether proprietary or standard, in today's world the carrier that sells the DSL service is responsible for purchasing and installing the required DSLAM (or equivalent).

74. To quote from the AT&T proposal, "[I]f a customer wishes to change service providers, the ELP architecture allows that migration to occur entirely using software,

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[8] There are several ADSL standards. The ANSI standard for ADSL is ANSI T1.413. There are also two ITU Recommendations, i.e., G.992.1, referred to as "g.dmt" and G.992.2, referred to as "g.lite." Even with such extensive standardization, significant interoperability issues still exist, years after the introduction of the technology.

with no need for a manual hot cut. A software command to the ATM module, and the associated tNGDLC electronics at the RT, allows the existing path to one carrier's network to be re-defined to a new carrier's network." [9] First, such a 'software command' presupposes the unbundling of the DSLAM functionality in the tNGDLC RT. That issue, though, has been extensively debated elsewhere, and will not be explored here. The AT&T proposal introduces another issue having to do with interoperability.

75. This instantaneous switching of a customer requires that the DSL modem on the end-user's premises, supported by both the end-user's previous carrier and the new carrier (indeed all carriers) is interoperable with the DSL transceiver in the tNGDLC RT. If it is necessary to dispatch technicians to replace equipment (at both the end-user's premises and the tNGLDC RT), the benefits of AT&T's proposal disappear altogether.

76. This notion of required interoperability with the tNGDLC DSL transceiver begs the question as to how the specific tNGDLC transceiver would ever get selected to begin with. No product can accommodate the variety of ADSL and ADSL-like technologies in the market, to say nothing of the other variants of DSL technology, e.g., SDSL, SHDSL, and VDSL. According to AT&T's proposal, the ILEC is presumably the entity purchasing the tNGDLC product. Since it is not likely that competitive DSL providers would agree with the selection made by the ILEC, the technology decision made by the ILEC would likely be countered in endless regulatory proceedings. The only way scenario in which the AT&T proposal could work is one where there is only one DSL technology supported in the tNGDLC RT, mandated by the FCC. Given the Commission's long-standing policy against picking technology "winners" and "losers,"[10] though, it is hard to see how such a mandate would occur.

ELP WOULD STIFLE INNOVATION

77. The DSL industry is continuously innovating. Innovations being discussed today include such things as "ADSL Plus" and "10 Meg DSL." In the DSL industry today, such innovations — involving both a new network-end transceiver and a new customer-end modem — are aggressively developed and marketed to individual carriers. Competitive carriers are free to deploy services without regard to the DSL technology selected by the ILEC. Adoption of the AT&T proposal would radically alter that process. Since, under their proposal, the tNGDLC equipment must be

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[9] See Clause 28 of the Herzberg Declaration.

[10] See, for example, ¶ 195 of the *Line Sharing Order*, *In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket Nos. 98-147 and 96-98, *Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in CC Docket No. 96-98*, 14 FCC Rcd 20912, 20998-99 (1999), where the Commission specifically recognized and sanctioned non-standard DSL embodiments.

altered or upgraded to accommodate the innovation, and since it is the ILEC who would be deploying the tNGDLC equipment on *all* lines, such innovations would require the explicit approval of the ILEC. Furthermore, DSL manufacturers not closely aligned with tNGDLC vendors would find themselves at a significant disadvantage.

78. It is difficult to imagine a scenario under which an innovation could be made in such an environment. The ILEC would be inclined to upgrade the tNGDLC product for such innovations that it finds promising. If, as is typically the case, there were competing technologies, such an upgrade would preclude one or more of the embodiments favored by competitive carriers. In most cases, innovations would entail so much regulatory burden as to render them unattractive. Quite simply, the AT&T proposal would put the brakes on DSL innovations.

79. To summarize, the cost required to implement the AT&T proposal is huge. It cannot be justified economically. Adopting the scheme would also require industry-wide acceptance of one DSL technology. Such acceptance will not be obtained without lengthy regulatory proceedings. Finally, their scheme would stifle innovation in the DSL industry and derail the mass deployment of broadband services.

80. This concludes our affidavit.

Kenneth L. Ainsworth

Sworn to and subscribed before me
A Notary Public, this 17th
day of July, 2002.

Notary Public

RUDINE J. DAVIS
Notary Public, Fulton County, Georgia
My Commission Expires May 16, 2006

W. Keith Milner

Sworn to and subscribed before me
A Notary Public, this 17th
Day of July, 2002.

Notary Public

RUDINE J. DAVIS
Notary Public, Fulton County, Georgia
My Commission Expires May 16, 2006

LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover. Asks for cable pair information.

LOOP CUTOVER PROCESS

Step 2: Technician types in cable pair number to obtain order number.

LOOP CUTOVER PROCESS

Step 3: Technician retrieves copy of work order.

LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to CLEC.

LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.

LOOP CUTOVER PROCESS

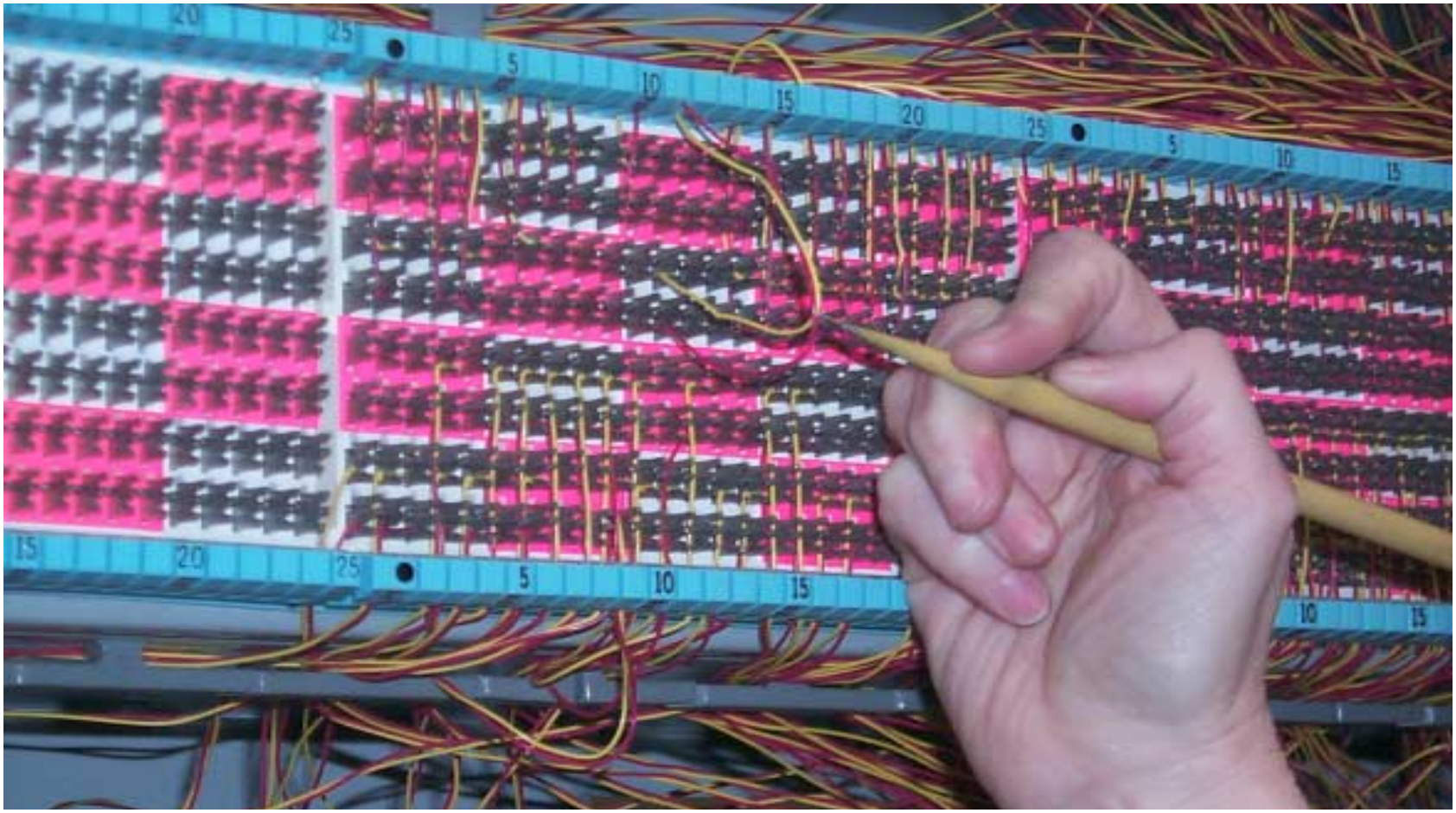
Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

LOOP CUTOVER PROCESS

Step 7: Technician locates precise location of jumper.

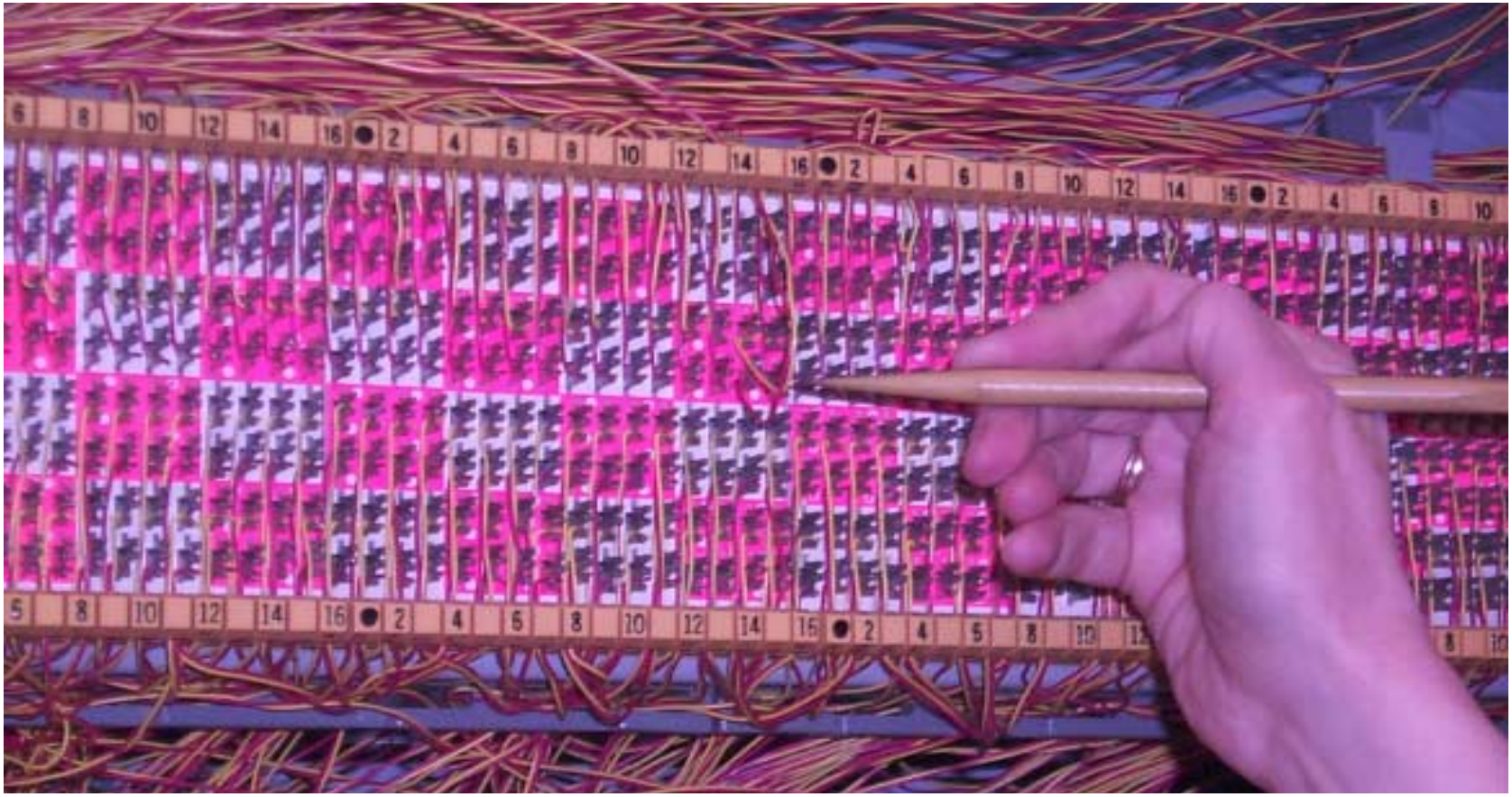
LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.



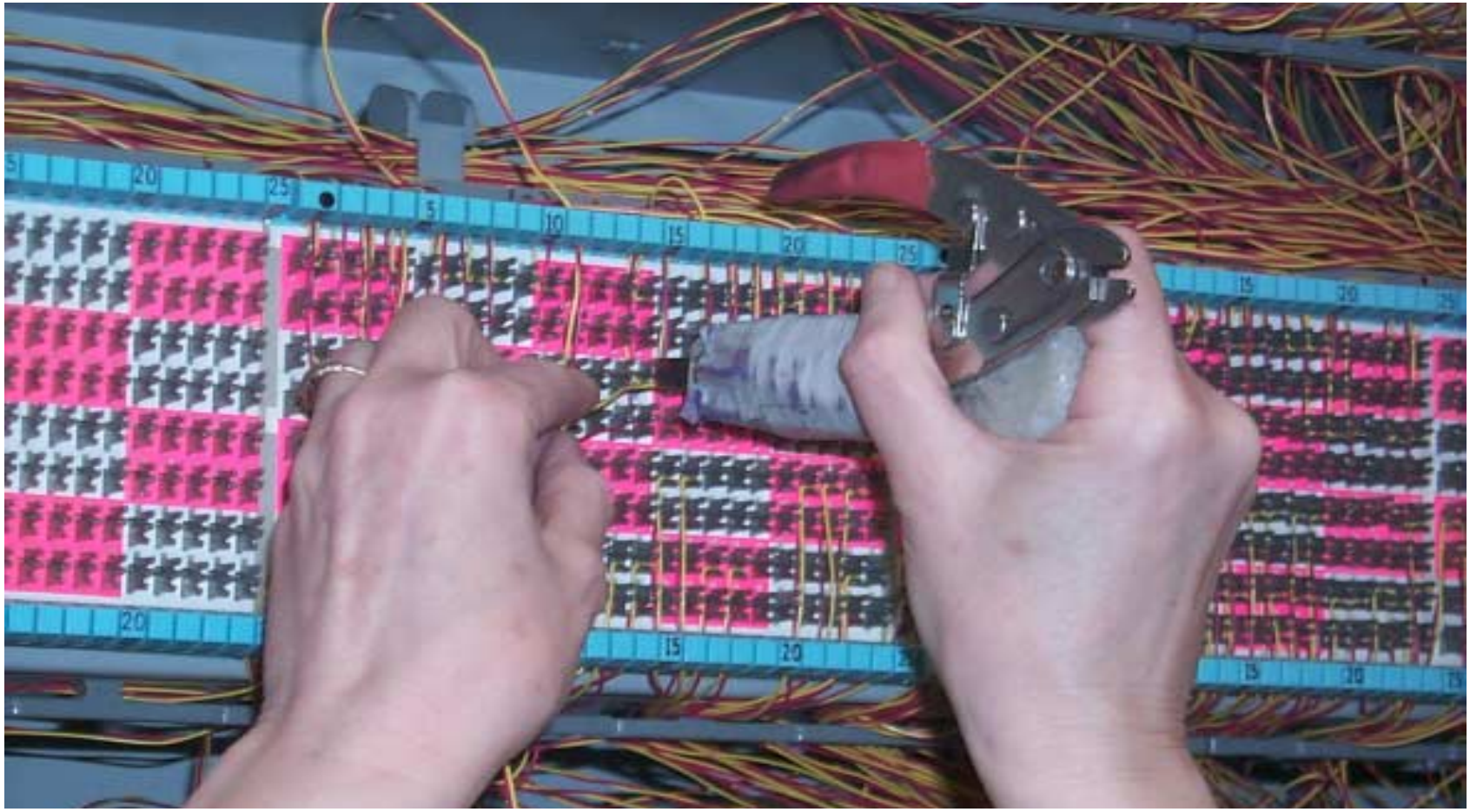
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



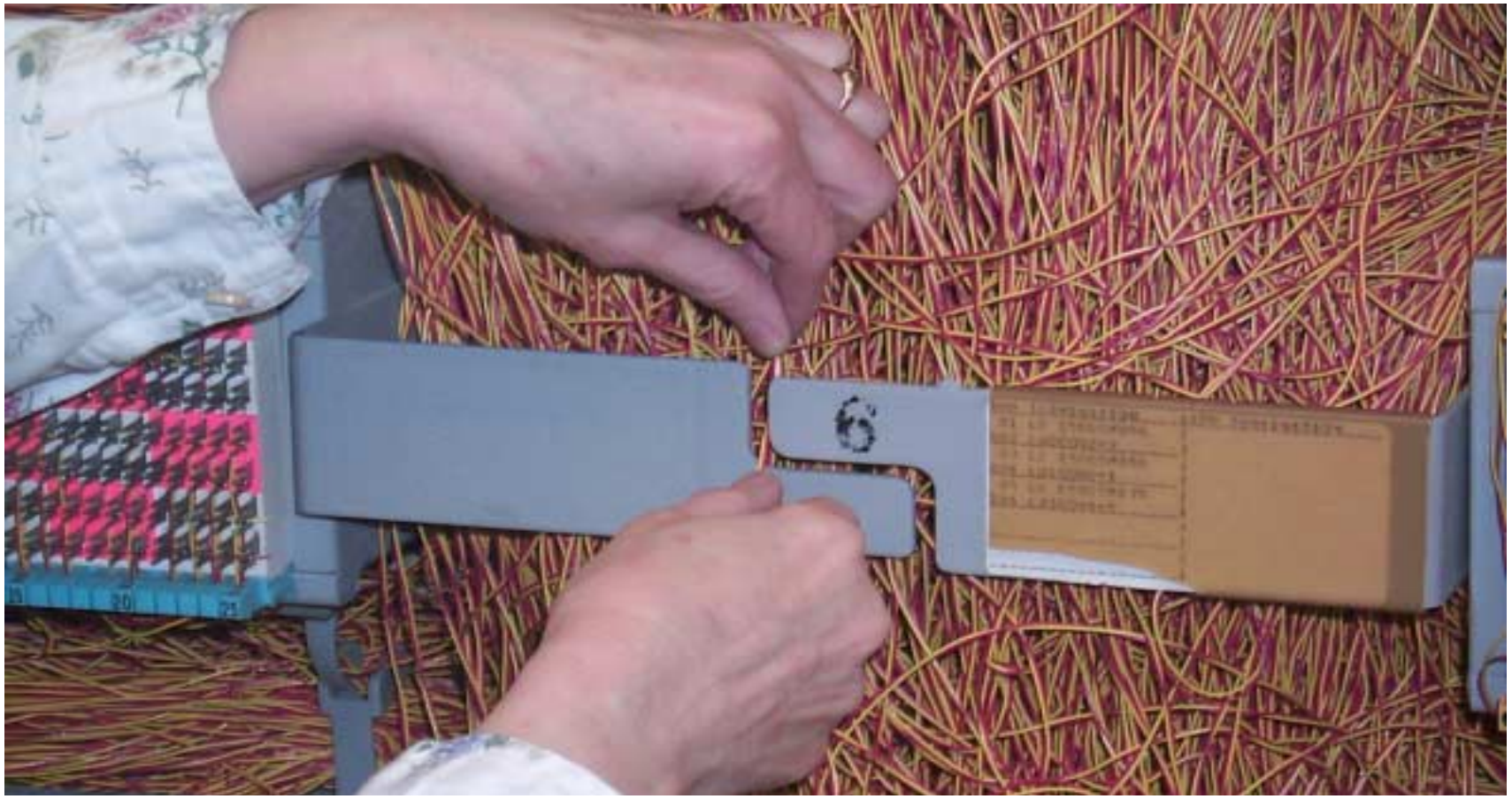
LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.



LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to CLEC's collocation equipment.



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to CLEC equipment.

LOOP CUTOVER PROCESS

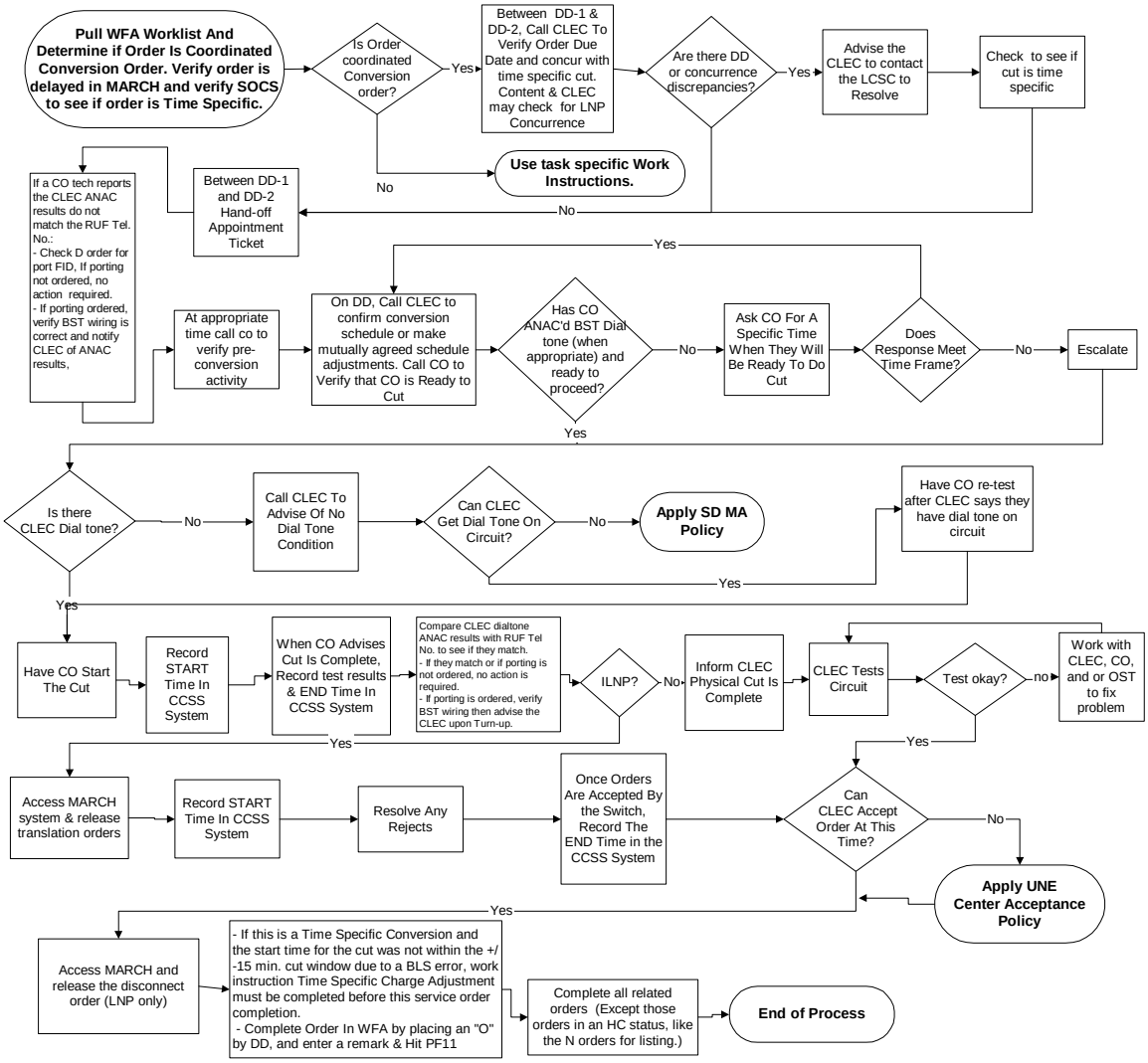
Step 13: Technician conducts ANAC test to verify that loop has been cut to correct CLEC switch port.

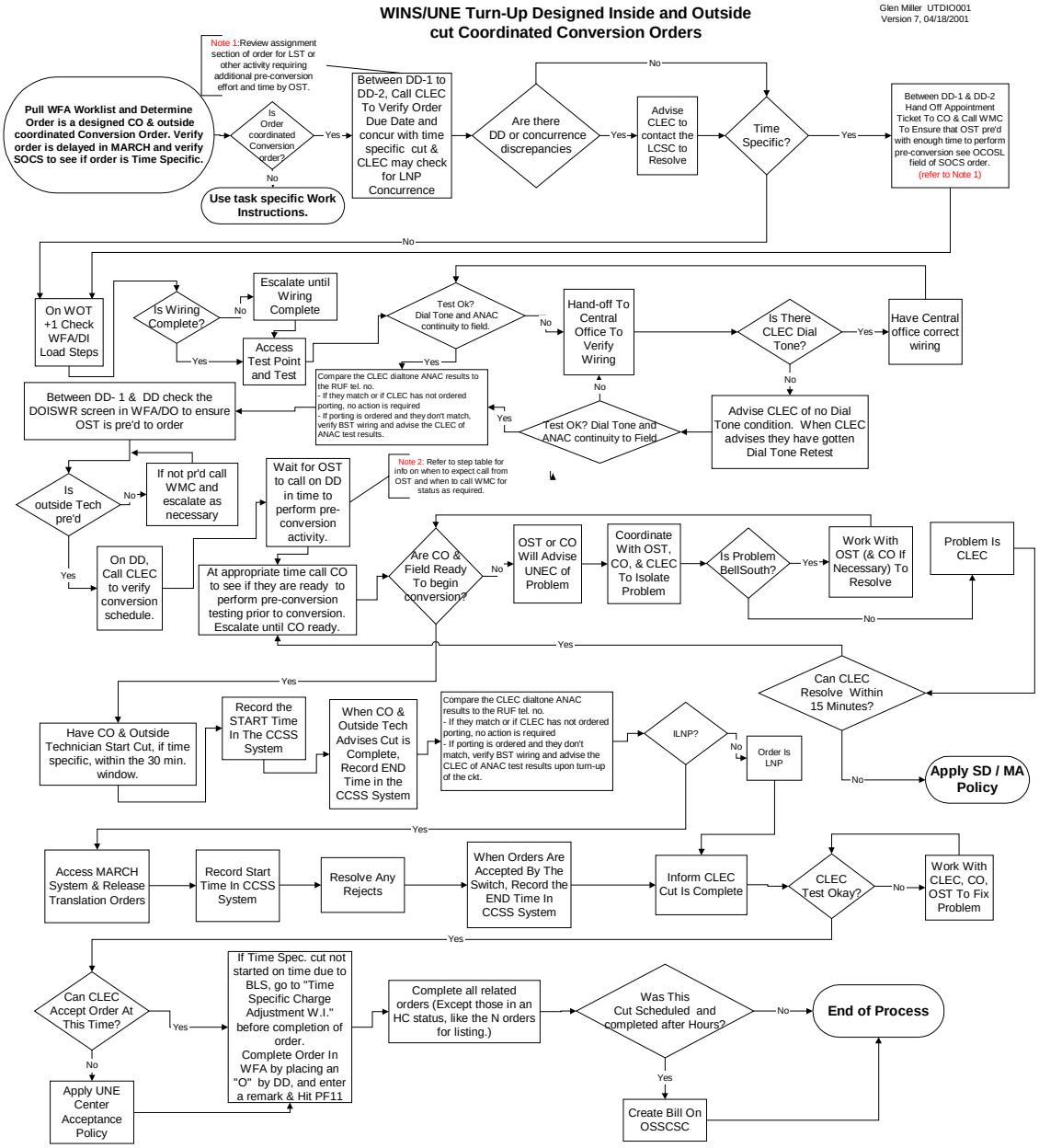
LOOP CUTOVER PROCESS

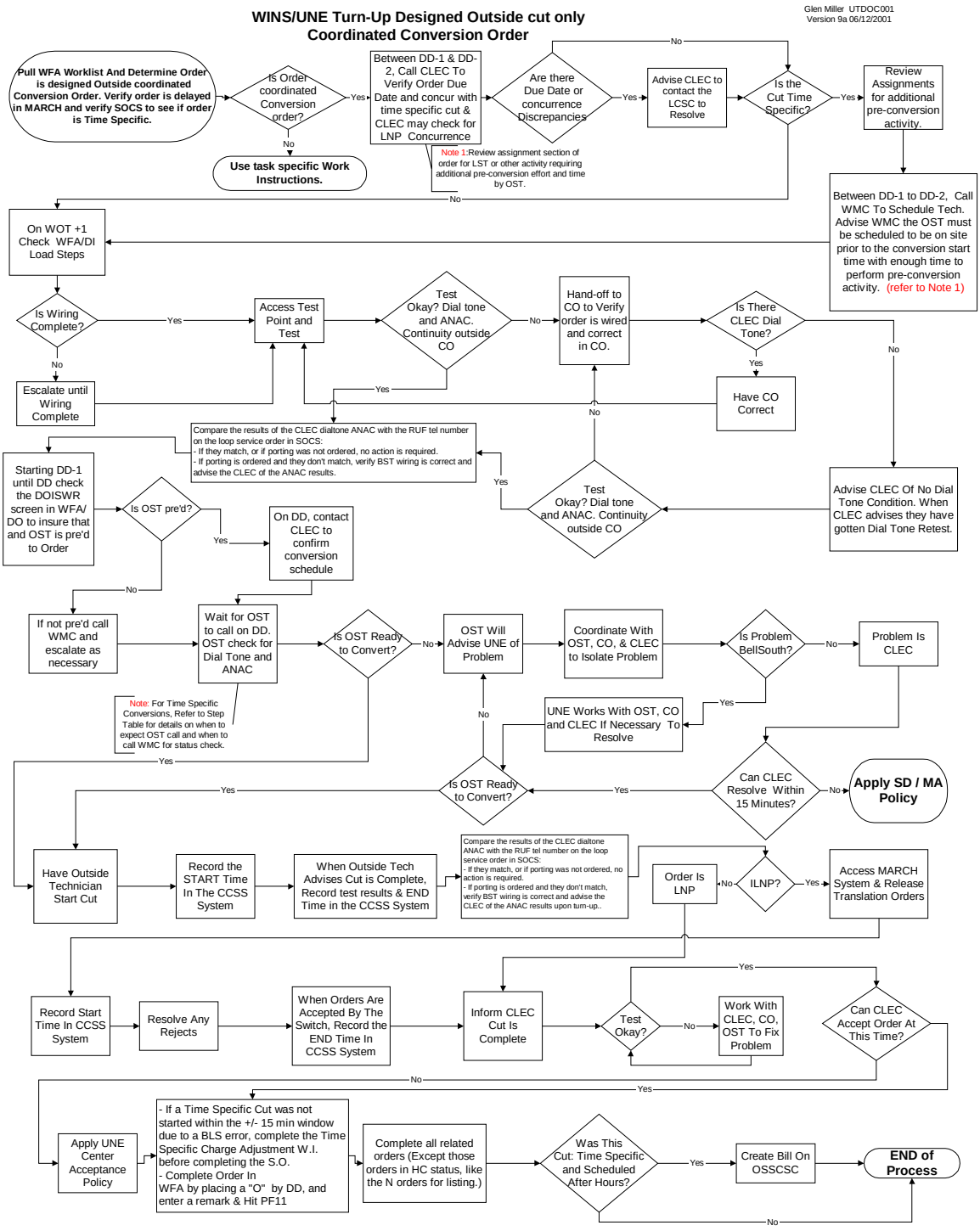
Step 14: Technician verifies cutover with CLEC, closes order, and notifies the UNE Center.

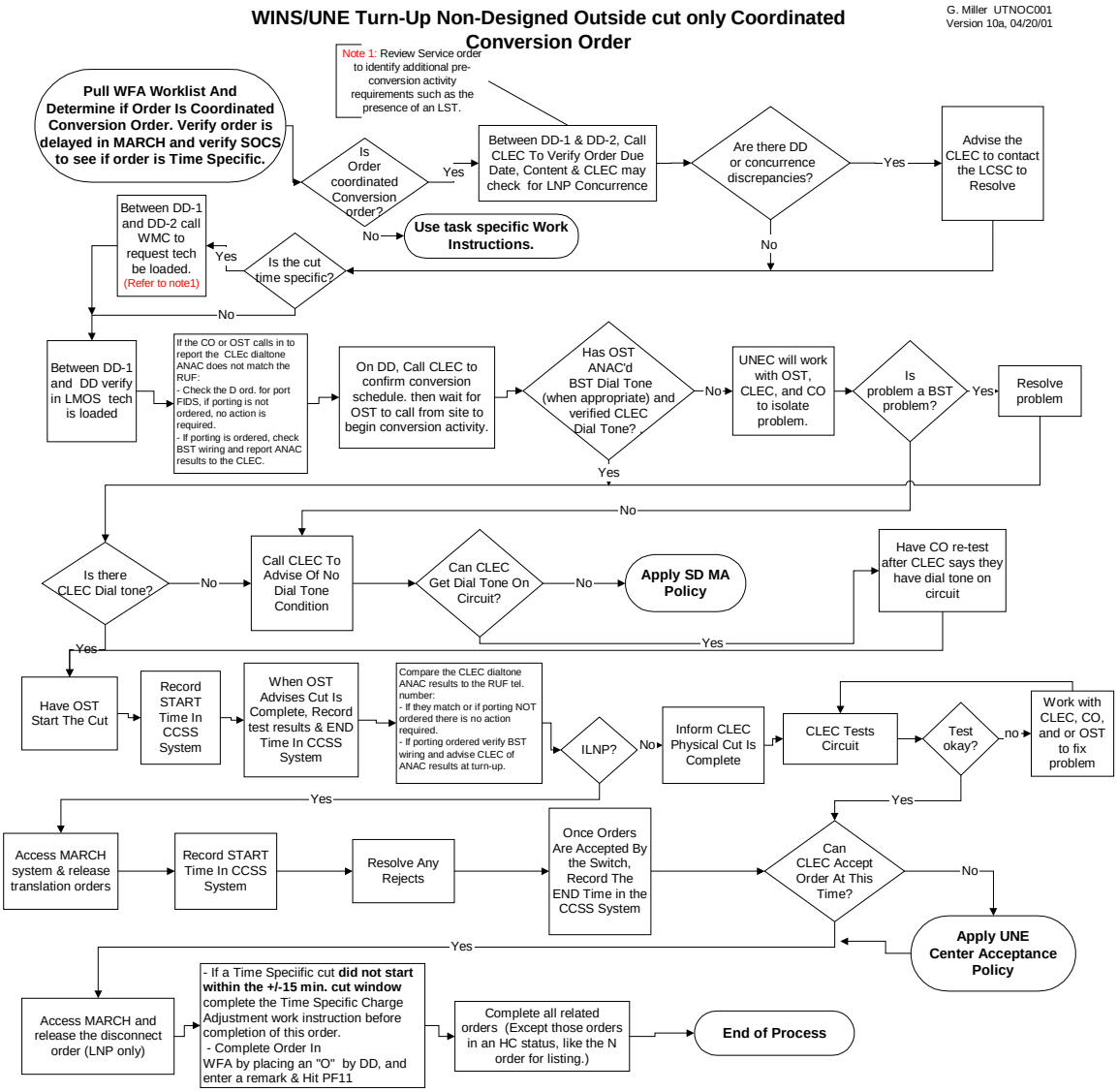
G. Miller UTNIC001
Version 10 04/11/01

CWINS/UNE Turn-Up Non-Designed Inside cut only Coordinated Conversion Order




WINS/UNE Turn-Up Designed Inside and Outside cut Coordinated Conversion Orders
Glen Miller UTDIO001
Version 7, 04/18/2001
Note 1:Review assignment section of order for LST or other activity requiring additional pre-conversion effort and time by OST.
Pull WFA Worklist and Determine Order is a designed CO & outside coordinated Conversion Order. Verify order is delayed in MARCH and verify SOCS to see if order is Time Specific.
Is Order coordinated Conversion order?
Yes
No
Use task specific Work Instructions.
Between DD-1 to DD-2, Call CLEC To Verify Order Due Date and concur with time specific cut & CLEC may check for LNP Concurrence
Are there DD or concurrence discrepancies
Yes
No
Advise CLEC to contact the LCSC to Resolve
Time Specific?
Yes
Between DD-1 & DD-2 Hand Off Appointment Ticket To CO & Call WMC To Ensure that OST pre'd with enough time to perform pre-conversion see OCOSL field of SOCS order. (refer to Note 1)
No
On WOT +1 Check WFA/DI Load Steps
Is Wiring Complete?
No
Escalate until Wiring Complete
Yes
Access Test Point and Test
Test Ok? Dial Tone and ANAC continuity to field.
No
Yes
Hand-off To Central Office To Verify Wiring
Is There CLEC Dial Tone?
Yes
Have Central office correct wiring
No
Advise CLEC of no Dial Tone condition. When CLEC advises they have gotten Dial Tone Retest
Test OK? Dial Tone and ANAC continuity to Field
Yes
No
Compare the CLEC dialtone ANAC results to the RUF tel. no.
- If they match or if CLEC has not ordered porting, no action is required
- If porting is ordered and they don't match, verify BST wiring and advise the CLEC of ANAC test results.
Between DD- 1 & DD check the DOISWR screen in WFA/DO to ensure OST is pre'd to order
Is outside Tech pre'd
No
If not pr'd call WMC and escalate as necessary
Yes
On DD, Call CLEC to verify conversion schedule.
Wait for OST to call on DD in time to perform pre-conversion activity.
Note 2: Refer to step table for info on when to expect call from OST and when to call WMC for status as required.
At appropriate time call CO to see if they are ready to perform pre-conversion testing prior to conversion. Escalate until CO ready.
Are CO & Field Ready To begin conversion?
No
OST or CO Will Advise UNEC of Problem
Coordinate With OST, CO, & CLEC To Isolate Problem
Is Problem BellSouth?
Yes
Work With OST (& CO If Necessary) To Resolve
No
Problem Is CLEC
Yes
Yes
Can CLEC Resolve Within 15 Minutes?
No
Apply SD / MA Policy
Have CO & Outside Technician Start Cut, if time specific, within the 30 min. window.
Record the START Time In The CCSS System
When CO & Outside Tech Advises Cut is Complete, Record END Time in the CCSS System
Compare the CLEC dialtone ANAC results to the RUF tel. no.
- If they match or if CLEC has not ordered porting, no action is required
- If porting is ordered and they don't match, verify BST wiring and advise the CLEC of ANAC test results upon turn-up of the ckt.
ILNP?
No
Order Is LNP
Yes
Access MARCH System & Release Translation Orders
Record Start Time In CCSS System
Resolve Any Rejects
When Orders Are Accepted By The Switch, Record the END Time In CCSS System
Inform CLEC Cut Is Complete
CLEC Test Okay?
No
Work With CLEC, CO, OST To Fix Problem
Yes
Can CLEC Accept Order At This Time?
Yes
If Time Spec. cut not started on time due to BLS, go to "Time Specific Charge Adjustment W.I." before completion of order. Complete Order In WFA by placing an "O" by DD, and enter a remark & Hit PF11
Complete all related orders (Except those in an HC status, like the N orders for listing.)
Was This Cut Scheduled and completed after Hours?
No
End of Process
Yes
No
Apply UNE Center Acceptance Policy
Create Bill On OSSCSC


WINS/UNE Turn-Up Designed Outside cut only
Coordinated Conversion Order
Glen Miller UTDOC001
Version 9a 06/12/2001
Pull WFA Worklist And Determine Order is designed Outside coordinated Conversion Order. Verify order is delayed in MARCH and verify SOCS to see if order is Time Specific.
Is Order coordinated Conversion order?
Yes
No
Use task specific Work Instructions.
Between DD-1 & DD-2, Call CLEC To Verify Order Due Date and concur with time specific cut & CLEC may check for LNP Concurrence
Note 1:Review assignment section of order for LST or other activity requiring additional pre-conversion effort and time by OST.
Are there Due Date or concurrence Discrepancies
Advise CLEC to contact the LCSC to Resolve
Is the Cut Time Specific?
Review Assignments for additional pre-conversion activity.
Between DD-1 to DD-2, Call WMC To Schedule Tech. Advise WMC the OST must be scheduled to be on site prior to the conversion start time with enough time to perform pre-conversion activity. (refer to Note 1)
On WOT +1 Check WFA/DI Load Steps
Is Wiring Complete?
Escalate until Wiring Complete
Access Test Point and Test
Test Okay? Dial tone and ANAC. Continuity outside CO
Hand-off to CO to Verify order is wired and correct in CO.
Is There CLEC Dial Tone?
Have CO Correct
Advise CLEC Of No Dial Tone Condition. When CLEC advises they have gotten Dial Tone Retest.
Test Okay? Dial tone and ANAC. Continuity outside CO
Compare the results of the CLEC dialtone ANAC with the RUF tel number on the loop service order in SOCS:
- If they match, or if porting was not ordered, no action is required.
- If porting is ordered and they don't match, verify BST wiring is correct and advise the CLEC of the ANAC results.
Starting DD-1 until DD check the DOISWR screen in WFA/ DO to insure that and OST is pre'd to Order
Is OST pre'd?
On DD, contact CLEC to confirm conversion schedule
If not pre'd call WMC and escalate as necessary
Wait for OST to call on DD. OST check for Dial Tone and ANAC
Is OST Ready to Convert?
OST Will Advise UNE of Problem
Coordinate With OST, CO, & CLEC to Isolate Problem
Is Problem BellSouth?
Problem Is CLEC
UNE Works With OST, CO and CLEC If Necessary To Resolve
Note: For Time Specific Conversions, Refer to Step Table for details on when to expect OST call and when to call WMC for status check.
Is OST Ready to Convert?
Can CLEC Resolve Within 15 Minutes?
Apply SD / MA Policy
Have Outside Technician Start Cut
Record the START Time In The CCSS System
When Outside Tech Advises Cut is Complete, Record test results & END Time in the CCSS System
Compare the results of the CLEC dialtone ANAC with the RUF tel number on the loop service order in SOCS:
- If they match, or if porting was not ordered, no action is required.
- If porting is ordered and they don't match, verify BST wiring is correct and advise the CLEC of the ANAC results upon turn-up..
Order Is LNP
ILNP?
Access MARCH System & Release Translation Orders
Record Start Time In CCSS System
Resolve Any Rejects
When Orders Are Accepted By The Switch, Record the END Time In CCSS System
Inform CLEC Cut Is Complete
Test Okay?
Work With CLEC, CO, OST To Fix Problem
Can CLEC Accept Order At This Time?
Apply UNE Center Acceptance Policy
- If a Time Specific Cut was not started within the +/- 15 min window due to a BLS error, complete the Time Specific Charge Adjustment W.I. before completing the S.O.
- Complete Order In WFA by placing a "O" by DD, and enter a remark & Hit PF11
Complete all related orders (Except those orders in HC status, like the N orders for listing.)
Was This Cut: Time Specific and Scheduled After Hours?
Create Bill On OSSCSC
END of Process


WINS/UNE Turn-Up Non-Designed Outside cut only Coordinated Conversion Order
G. Miller UTNOC001
Version 10a, 04/20/01
Note 1: Review Service order to identify additional pre-conversion activity requirements such as the presence of an LST.
Pull WFA Worklist And Determine if Order Is Coordinated Conversion Order. Verify order is delayed in MARCH and verify SOCS to see if order is Time Specific.
Is Order coordinated Conversion order?
Yes
No
Use task specific Work Instructions.
Between DD-1 & DD-2, Call CLEC To Verify Order Due Date, Content & CLEC may check for LNP Concurrence
Are there DD or concurrence discrepancies?
Yes
No
Advise the CLEC to contact the LCSC to Resolve
Between DD-1 and DD-2 call WMC to request tech be loaded. (Refer to note1)
Yes
Is the cut time specific?
No
Between DD-1 and DD verify in LMOS tech is loaded
If the CO or OST calls in to report the CLEc dialtone ANAC does not match the RUF:
- Check the D ord. for port FIDS, if porting is not ordered, no action is required.
- If porting is ordered, check BST wiring and report ANAC results to the CLEC.
On DD, Call CLEC to confirm conversion schedule. then wait for OST to call from site to begin conversion activity.
Has OST ANAC'd BST Dial Tone (when appropriate) and verified CLEC Dial Tone?
No
Yes
UNEC will work with OST, CLEC, and CO to isolate problem.
Is problem a BST problem?
Yes
Resolve problem
Is there CLEC Dial tone?
No
Call CLEC To Advise Of No Dial Tone Condition
Can CLEC Get Dial Tone On Circuit?
No
Apply SD MA Policy
Have CO re-test after CLEC says they have dial tone on circuit
Yes
Have OST Start The Cut
Record START Time In CCSS System
When OST Advises Cut Is Complete, Record test results & END Time In CCSS System
Compare the CLEC dialtone ANAC results to the RUF tel. number:
- If they match or if porting NOT ordered there is no action required.
- If porting ordered verify BST wiring and advise CLEC of ANAC results at turn-up.
ILNP?
No
Inform CLEC Physical Cut Is Complete
CLEC Tests Circuit
Test okay?
no
Work with CLEC, CO, and or OST to fix problem
Yes
Access MARCH system & release translation orders
Record START Time In CCSS System
Resolve Any Rejects
Once Orders Are Accepted By the Switch, Record The END Time in the CCSS System
Can CLEC Accept Order At This Time?
No
Apply UNE Center Acceptance Policy
Yes
Access MARCH and release the disconnect order (LNP only)
- If a Time Specific cut did not start within the +/-15 min. cut window complete the Time Specific Charge Adjustment work instruction before completion of this order.
- Complete Order In WFA by placing an "O" by DD, and enter a remark & Hit PF11
Complete all related orders (Except those orders in an HC status, like the N order for listing.)
End of Process

Glen Miller UTDIC001
Version 9, April 19, 2001

CWINS/UNE Turn-Up Designed Inside cut only Conversion Order